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10 *Attorneys for Defendants*  
11 *GOOGLE LLC and YOUTUBE, LLC*

12  
13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN JOSE DIVISION  
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17 BOGARD, MCGRATH, JANE DOE, BECCA  
18 SCHMILL FOUNDATION, *Individually and*  
*on behalf of all others similarly situated,*

19 Plaintiffs,

20 v.

21 TIKTOK, INC., BYTEDANCE, INC.,  
22 GOOGLE LLC, YOUTUBE, LLC,

23 Defendants.  
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Case No. 5:24-cv-03131-VKD

**DECLARATION OF TIANA DEMAS IN  
SUPPORT OF DEFENDANTS' JOINT MOTION  
TO DISMISS PLAINTIFFS' FIRST AMENDED  
COMPLAINT**

1 I, Tiana Demas, declare as follows:

2 1. I am an attorney at Cooley LLP and counsel for Defendants Google LLC and  
3 YouTube, LLC. I am admitted to practice before this Court *pro hac vice*. I have personal knowledge  
4 of the matters set forth below and if called as a witness, I could and would testify competently  
5 thereto. I submit this declaration in support of Defendants' Joint Motion to Dismiss Plaintiffs' First  
6 Amended Complaint.

7 2. Attached hereto as **Exhibit A** is a redline comparison showing the changes between  
8 Plaintiffs' original Complaint (ECF No. 1) and the First Amended Complaint (ECF No. 110).

9  
10 I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th  
11 day of May, 2025 in Washington, D.C.

12  
13 /s/ Tiana Demas

14 Tiana Demas  
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